

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of Virgin Mobile USA, L. P. for Limited  
Designation as an Eligible Telecommunications  
Carrier

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET  
NUMBER: 2010 - 91 - C

(Please type or print)

Submitted by: Margaret M. Fox, Esquire

SC Bar Number: 65418

Address: McNair Law Firm, P. A.

Telephone: 803-799-9800

P. O. Box 11390

Fax: 803-753-3219

Columbia, SC 29211

Other:

Email: pfox@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☐ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☒ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other:

- ☐ Affidavit  
☐ Agreement  
☐ Answer  
☐ Appellate Review  
☐ Application  
☐ Brief  
☐ Certificate  
☐ Comments  
☐ Complaint  
☐ Consent Order  
☐ Discovery  
☐ Exhibit  
☐ Expedited Consideration  
☐ Interconnection Agreement  
☐ Interconnection Amendment  
☐ Late-Filed Exhibit

- ☐ Letter  
☐ Memorandum  
☐ Motion  
☐ Objection  
☐ Petition  
☐ Petition for Reconsideration  
☐ Petition for Rulemaking  
☐ Petition for Rule to Show Cause  
☒ Petition to Intervene  
☐ Petition to Intervene Out of Time  
☐ Prefiled Testimony  
☐ Promotion  
☐ Proposed Order  
☐ Protest  
☐ Publisher's Affidavit  
☐ Report

- ☐ Request  
☐ Request for Certification  
☐ Request for Investigation  
☐ Resale Agreement  
☐ Resale Amendment  
☐ Reservation Letter  
☐ Response  
☐ Response to Discovery  
☐ Return to Petition  
☐ Stipulation  
☐ Subpoena  
☐ Tariff  
☐ Other:

Print Form

Reset Form

**MCNAIR**  
ATTORNEYS

April 12, 2010

Sue-Ann G. Shannon

sshannon@mcnair.net

T (803) 799-9800

F (803) 753-3219

**Via Electronic Filing**

Jocelyn G. Boyd  
Deputy Clerk  
SC Public Service Commission  
P O Drawer 11649 (29211)  
101 Executive Center Drive Synergy  
Business Park Saluda Building  
Columbia, SC 29210

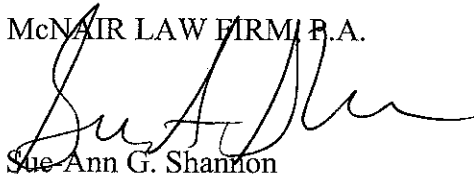
Re: Petition of Virgin Mobile USA, L.P. for Limited Designation as an  
Eligible Telecommunications Carrier  
Docket No. 2010-91-C

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of the South Carolina Telephone Coalition in the above-reference docket. By copy of this letter, I am serving a copy of this filing on all parties of record.

Sincerely,

MCNAIR LAW FIRM, P.A.



Sue-Ann G. Shannon

SGS:bw

Enclosures

cc: C. Lessie Hammonds, Esquire  
John J. Pringle, Jr., Esquire

McNair Law Firm, P. A.  
The Tower at 1301 Gervais  
1301 Gervais Street, 11th Floor  
Columbia, SC 29201

Mailing Address  
Post Office Box 11390  
Columbia, SC 29211

mcnair.net

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2010-91-C

Re: Petition for Limited Designation as an Eligible	)	
Telecommunications Carrier in the State	)	
of South Carolina	)	
_____	)	

**PETITION TO  
INTERVENE**

In response to the Commission's Notice of the Filing of the Petition of Virgin Mobile USA, L.P. ("Virgin Mobile") for limited designation as an eligible telecommunications carrier ("ETC") in the State of South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. In its petition, Virgin Mobile is seeking designation as an ETC for purposes of offering prepaid wireless services supported by the federal Universal Service Fund's Lifeline program. SCTC member companies are local exchange carriers who serve as carriers of last resort in their respective areas and, in addition, are rural telephone companies that rely on universal service support to continue the provision of affordable basic local exchange service in their respective service areas. SCTC's members are ETCs providing Lifeline services in their

respective areas. SCTC's members have a direct and substantial interest in this proceeding and will be affected by its outcome.

4. While SCTC has not yet fully developed a position on the petition at this time, SCTC believes that its participation in this proceeding will aid the Commission in a full and fair consideration and resolution of the request.

5. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
Sue-Ann Gerald Shannon  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

April 12, 2010

Columbia, South Carolina.

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

DOCKET NO. 2010-91-C

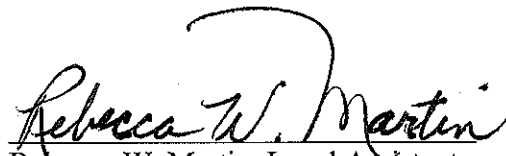
IN RE: Petition of Virgin Mobile USA, L.P. for Limited )  
Designation as an Eligible Telecommunications )  
Carrier )  
\_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

I, Rebecca W. Martin, do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene in the above-referenced matter to the persons named below by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

John J. Pringle, Esquire  
Ellis, Lawhorne & Sims, P. A.  
Post Office Box 2285  
Columbia, South Carolina 29202

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

  
Rebecca W. Martin, Legal Assistant  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

April 12, 2010

Columbia, South Carolina